

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MOHAMMAD MANSOUR and MARK  
MOSES,

Plaintiffs,

v.

FACTORY DIRECT OF SECAUCUS, LLC  
d/b/a ASHLEY FURNITURE  
HOMESTORE,

Defendants.

ECF CASE

Civil Action No. 13-cv-2443-SDW-SCM

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Michael S. Horn, Esq., dated January 30, 2015, together with the exhibits attached thereto, the Memorandum of Law, the Rule 56.1 Statement, and all prior pleadings and proceedings herein, Defendant Factory Direct of Secaucus, LLC d/b/a Ashley Furniture Homestore (“Defendant”) will move this Court, before the Honorable Susan D. Wigenton, United States District Judge, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on a date and time to be determined by the Court for an Order granting summary judgment, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that the answering papers, if any, shall be served and filed in accordance with the briefing schedule ordered by the Honorable Steven C. Mannion, U.S.M.J., on October 20, 2014.

Dated: January 30, 2015

**ARCHER & GREINER, P.C.**

/s/ Michael S. Horn

Michael S. Horn

Court Plaza South - West Wing

21 Main Street, Suite 353

Hackensack, New Jersey 07601

Phone: (201) 342-6000

Fax: (201) 342-6611

Email: [mhorn@archerlaw.com](mailto:mhorn@archerlaw.com)

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**CERTIFICATE OF SERVICE**

I, Michael S. Horn, admitted to practice before this Court, an attorney with the firm of Archer & Greiner, P.C. and attorneys for Defendant Factory Direct of Secaucus, LLC d/b/a Ashley Furniture Homestore, do hereby certify that on January 30, 2015, I electronically filed Defendant Factory Direct of Secaucus, LLC d/b/a Ashley Furniture Homestore's Notice of Motion for Summary Judgment, Declaration of Michael S. Horn with exhibits, Memorandum of Law, and the Rule 56.1 Statement, with the Clerk of the District Court of New Jersey using the CM/ECF system, which sent notification of such filing to the following:

Denise Rubin Glatter  
The Ottinger Firm, P.C.  
20 West 55th Street, 6th Floor  
New York, New York 10019

**ARCHER & GREINER, P.C.**

/s/ Michael S. Horn

Michael S. Horn  
Court Plaza South - West Wing  
21 Main Street, Suite 353  
Hackensack, New Jersey 07601  
Phone: (201) 342-6000  
Fax: (201) 342-6611  
Email: mhorn@archerlaw.com